

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

§ Civil Action No. 4:20-cv-00576
§
§ CLASS ACTION
§
The Honorable Charles R. Eskridge III

**SUPPLEMENTAL SUBMISSION REGARDING PLAINTIFFS' MOTION TO
COMPEL DOCUMENTS CONCERNING ANADARKO AUDIT COMMITTEE'S
PURPORTED INVESTIGATION**

Plaintiffs hereby attach as Exhibits A-B the privilege logs of Anadarko Audit Committee (“AAC”) members Eric Mullins and Mark McKinley, each dated May 3, 2022 (collectively, the “Privilege Logs”), for the Court’s consideration. These Privilege Logs were omitted from briefing regarding Plaintiffs’ April 12, 2022 Motion to Compel Documents Concerning Anadarko Audit Committee’s Purported Investigation (ECF 115) (the “Motion”) and discussed during the March 17, 2023 hearing regarding the Motion.

Although Plaintiffs’ Motion indicated that the AAC members were improperly withholding 59 documents based on claims of attorney-client privilege (Motion at 9), Messrs. Mullins and McKinley produced 23 of those documents on May 3, 2022 – nearly three weeks after the Motion was filed. Thus, Messrs. Mullins and McKinley continue to withhold 36 documents, in whole or in part, related to the investigation of Lea Frye’s allegations solely on the grounds of attorney-client privilege.

DATED: March 22, 2023

Respectfully submitted,

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s/ Joe Kendall
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Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on all counsel of record who have appeared in this matter via the Court's CM/ECF system on this, the 22nd day of March, 2023.

s/ Joe Kendall
JOE KENDALL